

S

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION**

UNITED STATES OF AMERICA

v.

**JALEN TYLEE HILL aka ROSCOE HILL,
TYAVIA DEASHIA RICHARDSON,
QUONTAVIUS MARKEESE HILL,
LAQUASHIA NICHOLE FRENCH,
ACCACIA RENAE GORDON,
DEKEYVIA MOASHA BLACKSHEAR,
JENETTA SMALL,
JAZMON LACE WHITEHEAD,
CHASITY LACOLE WELLONS,
KELBRESHA DANIELLE THOMAS,
KIMBREYANNA ANDRANIQUE PEEPLES, -
VICTORIA LYNN CARTER,
CHELSEA JA'NAY TULLIS,
JANITA BRE'SHAYE TERRY, -
SHANERIA SHARAE MURRAY, -
MERCEDES LASHON BROWN,**

**:
:
: CRIMINAL NO. 1:23-CR-6____
:
: VIOLATION(S):
:
: 18 U.S.C. § 1344(2)
: 18 U.S.C. § 1028(a)(3)
: 18 U.S.C. § 1028(b)(2)(B)
: 18 U.S.C. § 1028A(a)(1)
: 18 U.S.C. § 2
: 18 U.S.C. § 1708
: 18 U.S.C. § 371**

Defendants.

THE GRAND JURY CHARGES:

**COUNTS 1-68
Bank Fraud**

On or about the dates identified in the chart below, each row constituting a separate Count, in the Middle District of Georgia and elsewhere within this Court's jurisdiction, the Defendants, aided and abetted by each other and others known and unknown to the Grand Jury, knowingly executed and attempted to execute a scheme to obtain money, assets, and property under the custody and control of a financial institution, then insured by the Federal Deposit Insurance Corporation (FDIC), by means of materially false and fraudulent pretenses, representations, and promises, by negotiating and attempting to negotiate the following checks:

COUNT	DEFENDANTS	DATE	CHECK NUMBER	VICTIM BANK	AMOUNT
1	JALEN TYLEE HILL aka ROSCOE HILL	7/30/2021	57272	Wells Fargo	\$1325
2	JALEN TYLEE HILL aka ROSCOE HILL	8/2/2021	57272	Navy Federal	\$1325
3	JALEN TYLEE HILL aka ROSCOE HILL	8/4/2021	2460	Capital One	\$2450
4	JALEN TYLEE HILL aka ROSCOE HILL	8/4/2021	1194	Navy Federal	\$1500
5	JALEN TYLEE HILL aka ROSCOE HILL and TYAVIA DEASHIA RICHARDSON	8/4/2021	2460	Wells Fargo	\$2450
6	JALEN TYLEE HILL aka ROSCOE HILL	8/5/2021	104	Robins Financial Credit Union	\$500
7	JALEN TYLEE HILL aka ROSCOE HILL and TYAVIA DEASHIA RICHARDSON	8/30/2021	87441	Wells Fargo	\$1290
8	JALEN TYLEE HILL aka ROSCOE HILL and QUONTAVIUS MARKEESE HILL	8/30/2021	114369	Bank of America	\$1575
9	JALEN TYLEE HILL aka ROSCOE HILL and QUONTAVIUS MARKEESE HILL	8/30/2021	18266	Bank of America	\$601.89
10	JALEN TYLEE HILL aka ROSCOE HILL and LAQUASHIA NICHOLE FRENCH	9/2/2021	114275	PNC	\$1140.06
11	JALEN TYLEE HILL aka ROSCOE HILL and LAQUASHIA NICHOLE FRENCH	9/2/2021	1606	PNC	\$2000
12	JALEN TYLEE HILL aka ROSCOE HILL and	9/3/2021	17876	Bank of America	\$3250

	QUONTAVIUS MARKEESE HILL				
13	JALEN TYLEE HILL aka ROSCOE HILL and LAQUASHIA NICHOLE FRENCH	9/7/2021	1454	PNC	\$500
14	JALEN TYLEE HILL aka ROSCOE HILL and LAQUASHIA NICHOLE FRENCH	9/7/2021	1610	PNC	\$1000
15	JALEN TYLEE HILL aka ROSCOE HILL and LAQUASHIA NICHOLE FRENCH	9/7/2021	3976	PNC	\$587.85
16	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	9/14/2021	4553	PNC	\$2389
17	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	9/16/2021	2956	PNC	\$75
18	JALEN TYLEE HILL aka ROSCOE HILL and DEKEYVIA MOASHA BLACKSHEAR	9/17/2021	5335	Citizens Bank of Americus	\$5000
19	JALEN TYLEE HILL aka ROSCOE HILL and LAQUASHIA NICHOLE FRENCH	9/21/2021	4774	PNC	\$4911
20	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	9/21/2021	3768	PNC	\$3200
21	JALEN TYLEE HILL aka ROSCOE HILL and	9/22/2021	4553	Chase	\$2389

	QUONTAVIUS MARKEESE HILL				
22	JALEN TYLEE HILL aka ROSCOE HILL and QUONTAVIUS MARKEESE HILL	9/22/2021	28353	Chase	\$500
23	JALEN TYLEE HILL aka ROSCOE HILL and DEKEYVIA MOASHA BLACKSHEAR	9/22/2021	1754	Chase	\$3850
24	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	9/23/2021	600250	PNC	\$2142.02
25	JALEN TYLEE HILL aka ROSCOE HILL and JENETTA SMALL	9/23/2021	5447	PNC	\$525
26	JALEN TYLEE HILL aka ROSCOE HILL and JENETTA SMALL	9/23/2021	7848	PNC	\$200
27	JALEN TYLEE HILL aka ROSCOE HILL and JENETTA SMALL	9/23/2021	93416	PNC	\$165
28	JALEN TYLEE HILL aka ROSCOE HILL and JENETTA SMALL	9/23/2021	1501	PNC	\$94
29	JALEN TYLEE HILL aka ROSCOE HILL and QUONTAVIUS MARKEESE HILL	9/24/2021	1673	Chase	\$2500
30	JALEN TYLEE HILL aka ROSCOE HILL and TYAVIA DEASHIA RICHARDSON	9/27/2021	4273	Wells Fargo	\$1000
31	JALEN TYLEE HILL aka ROSCOE HILL	9/29/2021	1686	PNC	\$2500

	and JAZMON LACE WHITEHEAD				
32	JALEN TYLEE HILL aka ROSCOE HILL and JAZMON LACE WHITEHEAD	9/30/2021	1754	PNC	\$3850
33	JALEN TYLEE HILL aka ROSCOE HILL and JAZMON LACE WHITEHEAD	10/1/2021	25032	PNC	\$605
34	JALEN TYLEE HILL aka ROSCOE HILL and JAZMON LACE WHITEHEAD	10/1/2021	25033	PNC	\$637.55
35	JALEN TYLEE HILL aka ROSCOE HILL and JAZMON LACE WHITEHEAD	10/4/2021	77237	PNC	\$1125.01
36	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	10/6/2021	54757502	Wells Fargo	\$2489.67
37	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	10/6/2021	54757455	Wells Fargo	\$398.55
38	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	10/6/2021	54757458	Wells Fargo	\$398.55
39	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	10/6/2021	54757454	Wells Fargo	\$398.55
40	JALEN TYLEE HILL aka ROSCOE HILL and	10/6/2021	54757451	Wells Fargo	\$398.55

	ACCACIA RENAE GORDON				
41	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	10/7/2021	54757575	Wells Fargo	\$2448.63
42	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	10/7/2021	2629	Wells Fargo	\$1926.45
43	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	10/7/2021	2626	Wells Fargo	\$1502.30
44	JALEN TYLEE HILL aka ROSCOE HILL and ACCACIA RENAE GORDON	10/7/2021	54757574	Wells Fargo	\$2448.63
45	JALEN TYLEE HILL aka ROSCOE HILL and JAZMON LACE WHITEHEAD	10/27/2021	25034	Robins Financial Credit Union	\$291.03
46	JALEN TYLEE HILL aka ROSCOE HILL and CHASITY LACOLE WELLONS	10/28/2021	7848	Chase	\$2000
47	JALEN TYLEE HILL aka ROSCOE HILL and CHASITY LACOLE WELLONS	11/12/2021	1501	Chase	\$3000
48	JALEN TYLEE HILL aka ROSCOE HILL and KELBRESHA DANIELLE THOMAS	11/12/2021	18266	PNC	\$601.89
49	JALEN TYLEE HILL aka ROSCOE HILL and	11/12/2021	143	PNC	\$495

	KELBRESHA DANIELLE THOMAS				
50	JALEN TYLEE HILL aka ROSCOE HILL and KELBRESHA DANIELLE THOMAS	11/15/2021	1454	Chase	\$5000
51	JALEN TYLEE HILL aka ROSCOE HILL and JAZMON LACE WHITEHEAD	11/16/2021	315	Chase	\$5000
52	JALEN TYLEE HILL aka ROSCOE HILL and KIMBREYANNA ANDRANIQUE PEEPLS	11/17/2021	12699	Robins Financial Credit Union	\$3640
53	JALEN TYLEE HILL aka ROSCOE HILL and VICTORIA LYNN CARTER	11/17/2021	16065	Truist	\$5000
54	JALEN TYLEE HILL aka ROSCOE HILL and CHASITY LACOLE WELLONS	11/19/2021	1454	Chase	\$5000
55	JALEN TYLEE HILL aka ROSCOE HILL and KELBRESHA DANIELLE THOMAS	11/19/2021	25029	Chase	\$5000
56	JALEN TYLEE HILL aka ROSCOE HILL and CHELSEA JA'NAY TULLIS	11/19/2021	4762	Chase	\$5000
57	JALEN TYLEE HILL aka ROSCOE HILL and	11/22/2021	3988	Bank of America	\$2500

	KIMBREYANNA ANDRANIQUE PEEPLS				
58	JALEN TYLEE HILL aka ROSCOE HILL and JANITA BRE'SHAYE TERRY	11/22/2021	8507	Navy Federal	\$15468
59	JALEN TYLEE HILL aka ROSCOE HILL and JANITA BRE'SHAYE TERRY	11/22/2021	8507	Navy Federal	\$15468
60	JALEN TYLEE HILL aka ROSCOE HILL and SHANERIA SHARAE MURRAY	11/22/2021	2028	Truist	\$2000
61	JALEN TYLEE HILL aka ROSCOE HILL and JANITA BRE'SHAYE TERRY	11/23/2021	1686	Truist	\$2500
62	JALEN TYLEE HILL aka ROSCOE HILL and SHANERIA SHARAE MURRAY	11/23/2021	10199	Truist	\$3000
63	JALEN TYLEE HILL aka ROSCOE HILL and JANITA BRE'SHAYE TERRY	11/26/2021	10907	Truist	\$2000
64	JALEN TYLEE HILL aka ROSCOE HILL and MERCEDES LASHON BROWN	12/1/2021	1051	Truist	\$2000
65	JALEN TYLEE HILL aka ROSCOE HILL and MERCEDES LASHON BROWN	12/2/2021	4126	Truist	\$2000
66	JALEN TYLEE HILL aka ROSCOE HILL and	12/3/2021	12770	Truist	\$3217.50

	MERCEDES LASHON BROWN				
67	JALEN TYLEE HILL aka ROSCOE HILL	12/7/2021	4788	Woodforest Bank	\$3000
68	JALEN TYLEE HILL aka ROSCOE HILL	12/15/2021	4126	Citizens Bank of Americus	\$1000
TOTAL:					\$165,743.68

In violation of Title 18, United States Code, Sections 1344(2), and 2.

COUNTS 69-82
Aggravated Identity Theft

On or about the dates identified in the chart below, each row constituting a separate Count, in the Middle District of Georgia and elsewhere within this Court's jurisdiction, the Defendant,

JALEN TYLEE HILL aka ROSCOE HILL

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a violation of Title 18, United States Code, Section 1344, knowing that the means of identification belonged to the following actual persons listed below:

COUNT	DATE	VICTIM	MEANS OF IDENTIFICATION
69	8/4/2021	T.R.	Debit Card
70	9/17/2021	D.B.	Debit Card
71	9/21/2021	L.F.	Debit Card
72	9/27/2021	T.R.	Debit Card
73	10/6/2021	A.G.	Debit Card
74	10/6/2021	A.G.	Debit Card
75	10/6/2021	A.G.	Debit Card
76	10/6/2021	A.G.	Debit Card
77	10/6/2021	A.G.	Debit Card
78	10/7/2021	A.G.	Debit Card
79	10/7/2021	A.G.	Debit Card
80	10/7/2021	A.G.	Debit Card
81	10/7/2021	A.G.	Debit Card
82	11/17/2021	K.P.	Debit Card

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 83**Fraud in Connection with Identification Documents**

From on or about November 15, 2021 to on or about December 7, 2021, in the Albany Division of the Middle District of Georgia, the Defendant,

JALEN TYLEE HILL aka ROSCOE HILL

knowingly possessed in and affecting interstate commerce with intent to use and transfer unlawfully five or more identification documents, other than those issued lawfully for the use of the Defendant, that is, drivers licenses, birth certificates, social security cards, and documents made and issued by and under the authority of the United States, the State of Georgia, and other states intended and commonly accepted for the purpose of identification of individuals.

In violation of Title 18, United States Code, Sections 1028(a)(3), 1028(b)(2)(B).

COUNTS 84-111**Aggravated Identity Theft**

On or about the dates identified in the chart below, each row constituting a separate Count, in the Middle District of Georgia and elsewhere within this Court's jurisdiction, the Defendant,

JALEN TYLEE HILL aka ROSCOE HILL

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of Title 18, United States Code, Section 1028(a)(3) set forth in Count 83 of this Indictment, knowing that the means of identification belonged to the following actual persons listed below:

<u>COUNT</u>	<u>DATE</u>	<u>VICTIM</u>	<u>MEANS OF IDENTIFICATION</u>
84	11/15/2021 – 12/7/2021	E.R.	GA ID Card and SSN
85	11/15/2021 – 12/7/2021	S.G.	GA CDL and SSN
86	11/15/2021 – 12/7/2021	M.W.	GA DL and SSN

87	11/15/2021 – 12/7/2021	A.P.	GA DL and SSN
88	11/15/2021 – 12/7/2021	Y.S.	GA DL Permit and SSN
89	11/15/2021 – 12/7/2021	J.W.	SSN
90	11/15/2021 – 12/7/2021	B.P.	Birth Certificate and GA DL Permit
91	11/15/2021 – 12/7/2021	J.W.	GA DL Permit
92	11/15/2021 – 12/7/2021	J.F.	GA ID Card and SSN
93	11/15/2021 – 12/7/2021	K.W.	GA DL Permit and Birth Certificate
94	11/15/2021 – 12/7/2021	J.S.	GA ID Card and SSN
95	11/15/2021 – 12/7/2021	E.B.	GA DL Permit and Birth Certificate
96	11/15/2021 – 12/7/2021	D.J.	GA DL and Birth Certificate
97	11/15/2021 – 12/7/2021	Q.W.	GA ID Card and SSN
98	11/15/2021 – 12/7/2021	D.M.	GA DL and SSN
99	11/15/2021 – 12/7/2021	K.W.	GA ID Card and SSN
100	11/15/2021 – 12/7/2021	D.B.	GA ID Card
101	11/15/2021 – 12/7/2021	C.P.	AL DL and SSN
102	11/15/2021 – 12/7/2021	J.M.	GA DL and SSN
103	11/15/2021 – 12/7/2021	D.G.	GA Voters ID Card and SSN
104	11/15/2021 – 12/7/2021	A.G.	GA DL and SSN
105	11/15/2021 – 12/7/2021	T.D.	GA DL and SSN
106	11/15/2021 – 12/7/2021	J.L.	GA ID Card
107	11/15/2021 – 12/7/2021	L.M.	GA ID Card and Birth Certificate
108	11/15/2021 – 12/7/2021	C.C.	GA ID Card and SSN
109	11/15/2021 – 12/7/2021	M.H.	GA DL and SSN

110	11/15/2021 – 12/7/2021	D.R.	TX ID Card and SSN
111	11/15/2021 – 12/7/2021	A.B.	GA ID Card

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 112
Conspiracy to Possess Stolen Mail

From on or about July 12, 2021 to on or about December 22, 2021, in the Middle District of Georgia and elsewhere within this Court's jurisdiction, the Defendant,

JALEN TYLEE HILL aka ROSCOE HILL

did knowingly and intentionally conspire and agree with others known and unknown to the Grand Jury, to buy, receive, conceal, and unlawfully possess, any letter, postal card, package, bag, and mail, and any article and thing contained therein, which has been stolen, taken, embezzled, and abstracted, as herein described, knowing the same to have been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter, in violation of Title 18, United States Code, Section 1708.

MANNER AND MEANS OF THE CONSPIRACY:

It was an object of the conspiracy that:

1. Defendant, JALEN TYLEE HILL aka ROSCOE HILL, would travel in, around, and outside of the Middle District of Georgia and steal mail out of residential and business mailboxes;
2. Defendant, JALEN TYLEE HILL aka ROSCOE HILL, would possess, conceal, and open said stolen mail in order to obtain bank checks;
3. Defendant, JALEN TYLEE HILL aka ROSCOE HILL, would forge said stolen bank checks and recruit other persons known and unknown to the Grand Jury via social media

to allow Defendant to negotiate and attempt to negotiate said checks into those other persons' bank accounts in order to split the ill-begotten gains and conceal Defendant's identity.

OVERT ACTS

4. In furtherance of the conspiracy, and to effect the objects of the conspiracy, the Defendant, JALEN TYLEE HILL aka ROSCOE HILL, and others known and unknown to the Grand Jury, did commit and cause to be committed, the following overt acts, among others, in the Middle District of Georgia:
 - a. On or about August 14, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture a video file on his cell phone depicting a bank check stolen from a mailbox;
 - b. On or about October 25, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture a video file on his cell phone depicting a bank check stolen from a mailbox;
 - c. On or about October 26, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture a video file on his cell phone depicting a birthday card and United States currency stolen from a mailbox;
 - d. On or about October 29, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture a video file on his cell phone depicting a Wells Fargo bank statement stolen from a mailbox;
 - e. On or about December 1, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture a video file on his cell phone depicting multiple bank checks stolen from a mailbox and exclaiming said checks were stolen out of a mailbox

located in front of Walmart;

- f. Between on or about December 4, 2021 and on or about December 9, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did inform another individual via social media that he has stolen more than 100 individual checks out of mailboxes; that he has stolen mail out of mailboxes in Americus, Georgia; and that he intends to steal more mail out of mailboxes in Florida;
- g. On or about December 15, 2021, 2021, Defendant, JALEN TYLEE HILL aka ROSCOE HILL, did capture multiple video files on his cell phone depicting multiple bank checks stolen from mailboxes;
- h. The chart below summarizes the bank checks depicted in the above-mentioned videos:

Bank on Check	Check Dated	Check Amount
Citizens Bank of Americus	7/12/2021	\$2,500
Five Star Credit Union	7/29/2021	\$165
BB&T	7/30/2021	\$501
US Bank	8/1/2021	\$126
Ameris Bank	8/3/2021	\$650
Atlantic Capital Bank	8/5/2021	\$600
Citizens Bank of Americus	8/6/2021	\$40
Citizens Bank of Americus	8/12/2021	\$70
Citizens Bank of Americus	8/12/2021	\$125
Citizens Bank of Americus	8/13/2021	\$500
Citizens Bank of Americus	8/13/2021	\$55

Citizens Bank of Americus	8/15/2021	\$650
One South	8/20/2021	\$1,140
Fidelity	8/23/2021	\$1,290
SunTrust	8/24/2021	\$6,994
JP Morgan Chase	8/25/2021	\$408.52
Regions	8/25/2021	\$587.85
SB&T	8/27/2021	\$601.89
Citizens Bank of Americus	8/30/2021	\$104
Citizens Bank of Americus	8/30/2021	\$55
Synovus	8/30/2021	\$75
TD Bank	8/31/2021	\$3,200
TD Bank	8/31/2021	\$3,850
Fidelity Bank	9/1/2021	\$875
Suntrust	9/1/2021	\$268
US Bank	9/1/2021	\$67
Citizens Bank of Americus	9/3/2021	\$30
Citizens Bank of Americus	9/3/2021	\$50
Citizens Bank of Americus	9/3/2021	\$62
First Citizens Bank	9/3/2021	\$2,013
Wells Fargo	9/7/2021	\$3,150
BB&T	9/8/2021	\$75
PNC Bank	9/8/2021	\$525

Old Plank Trail Community Bank	9/9/2021	\$5,124
BB&T	9/10/2021	\$570
Synovus	9/10/2021	\$2,389
Synovus	9/10/2021	\$85
Colony Bank	9/16/2021	\$86
Synovus	9/16/2021	\$450
Synovus	9/16/2021	\$200
Synovus	9/16/2021	\$300
BB&T	9/17/2021	\$570
South GA Banking Company	9/17/2021	\$1,125.01
Wells Fargo	9/17/2021	\$11
BB&T	9/20/2021	\$500
Synovus	9/21/2021	\$5,000
Synovus	9/21/2021	\$291.03
Synovus	9/21/2021	\$605
Synovus	9/21/2021	\$637.55
Synovus	9/21/2021	\$39
Citizens Bank of Americus	9/22/2021	\$25
United Community Bank	9/22/2021	\$35
Regions	9/24/2021	\$13
Synovus	9/29/2021	\$114
Synovus	9/29/2021	\$113
Citizens Bank of Americus	10/5/2021	\$130

Citizens Bank of Americus	10/13/2021	\$39
Smart Bank	10/19/2021	\$175
Synovus	10/19/2021	\$930
First Bank	10/20/2021	\$11,149.60
Branch Banking and Trust	10/21/2021	\$101
Citizens Bank of Americus	10/22/2021	\$850
United Community Bank	11/1/2021	\$100
Fifth Third Bank	11/2/2021	\$2,112
Bank of New York Mellon	11/4/2021	\$300
USAA Federal Savings Bank	11/4/2021	\$2,000
Planters First Bank	11/11/2021	\$3,000
City National Bank	11/12/2021	\$94
Synovus	11/15/2021	\$5,000
SunTrust	11/16/2021	\$5,000
Wells Fargo	11/16/2021	\$2,000
Wells Fargo	11/16/2021	\$155
Synovus	11/17/2021	\$1,690
Smart Bank	11/18/2021	\$175
Synovus	11/18/2021	\$3,000
Bank of America	11/19/2021	\$360
Bank of America	11/19/2021	\$821
Bank of America	11/19/2021	\$270
Synovus	11/19/2021	\$5,000

Wells Fargo	11/19/2021	\$5,000
Bank of America	11/20/2021	\$343
Wells Fargo	11/21/2021	\$135
Wells Fargo	11/22/2021	\$500
Bank of America	11/23/2021	\$321
Citizens Bank of Americus	11/23/2021	\$2,500
First National Bank	11/23/2021	\$1,400
Bank of America	11/24/2021	\$330
First Bank	11/29/2021	12,504.80
Sunstate Federal Credit Union	11/30/2021	\$3,000
Peoples Bank of Georgia	12/1/2021	\$50
Synovus	12/1/2021	\$3,218
Synovus	12/1/2021	\$1,000

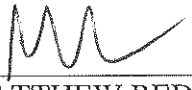
All in violation of Title 18, United States Code, Section 371.

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

PRESENTED BY:

PETER D. LEARY
UNITED STATES ATTORNEY



MATTHEW REDAVID
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 15 *day of*
SEP *A.D. 20*23.



Deputy Clerk